

1 PILLSBURY WINTHROP SHAW PITTMAN LLP  
2 MARC H. AXELBAUM # 209855  
3 marc.axelbaum@pillsburylaw.com  
4 LINDSAY A. LUTZ # 254442  
5 lindsay.lutz@pillsburylaw.com  
6 Four Embarcadero Center, 22nd Floor  
7 San Francisco, CA 94111  
8 Telephone: (415) 983-1000  
9 Facsimile: (415) 983-1200  
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11 Attorneys for Defendant  
12 EVELYN LANGFORD  
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8 IN THE UNITED STATES DISTRICT COURT  
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10 FOR THE NORTHERN DISTRICT OF CALIFORNIA

11 UNITED STATES OF AMERICA, ) No. 3:15-cr-00035-JST  
12 Plaintiff, )  
13 vs. ) **STIPULATION AND [PROPOSED]**  
14 ) **ORDER FOR MODIFICATION OF**  
15 ) **TRAVEL RESTRICTIONS**  
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17 WHEREAS on March 20, 2015, the Court entered an Order Setting Conditions of  
18 Release and Appearance Bond (“Order”) for Defendant Evelyn Langford (the  
19 “Defendant”);

20 WHEREAS the Order limits the travel of Ms. Langford to the Northern District of  
21 California, Eastern District of California, and Texas;

22 WHEREAS Defendant has requested a modification of her travel restrictions to  
23 allow her to travel to New Mexico from May 15 through May 18, 2015 for the college  
24 graduation of her son;

25 WHEREAS Defendant’s counsel has discussed the modification with U.S. Pretrial  
26 Services Officer Victoria Gibson and Ms. Gibson has approved the modification;

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1            WHEREAS Defendant will provide a full itinerary prior to travel to her U.S. Pretrial  
2            Services Officer in Texas;

3           WHEREAS the Government stipulates to the modification of Ms. Langford's travel  
4    restrictions;

5 WHEREFORE, the parties respectfully request that this Court issue the Proposed  
6 Order.

## IT IS SO STIPULATED.

8 Dated: May 1, 2015. PILLSBURY WINTHROP SHAW PITTMAN LLP

By:        /s/ *Marc H. Axelbaum*

Marc H. Axelbaum  
marc.axelbaum@pillsburylaw.com  
Lindsay A. Lutz  
lindsay.lutz@pillsburylaw.com

Four Embarcadero Center, 22nd Floor  
San Francisco, CA 94111  
Telephone: (415) 983-1000  
Facsimile: (415) 983-1200

*Attorneys for Defendant Evelyn Langford*

16 Dated: May 1, 2015.

MELINDA HAAG  
United States Attorney

DAVID R. CALLAWAY  
Chief, Criminal Division

By: /s/ Kyle F. Waldinger

Kyle F. Waldinger  
Kyle.Waldinger@usdoj.gov  
Hallie Mitchell Hoffman  
Hallie.Hoffman@usdoj.gov  
Assistant United States Atto

450 Golden Gate Avenue  
Box 36055  
San Francisco, CA 94102-3495  
Telephone: (415) 436-6830/7129  
Facsimile: (415) 436-7234

Attorneys for United States of America

27 The filer attests that that concurrence in the filing of this document has been  
28 obtained from the above signatories.

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**[PROPOSED] ORDER**

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PURSUANT TO STIPULATION, IT IS SO ORDERED: the Order Setting

3 Conditions of Release and Appearance Bond for Defendant Evelyn Langford is hereby

4 modified to allow Defendant to travel to New Mexico on May 15 through May 18, 2015.

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6 **IT IS SO ORDERED.**

7 Date: 5/4/15

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Kandis Westmore

U.S. Magistrate Judge Kandis A. Westmore

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